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10 Attorneys for Claimant  
11 JIA YUE

12  
13 UNITED STATES DISTRICT COURT  
14 NORTHERN DISTRICT OF CALIFORNIA  
15 SAN FRANCISCO DIVISION  
16

17 UNITED STATES OF AMERICA,  
18  
19 Plaintiff,  
20  
21 v.  
22  
23 \$10,000 IN UNITED STATES CURRENCY,  
24  
25 Defendant.  
26

Case No. 3:10-cv-00167-VRW

**STIPULATION AND ~~PROPOSED~~  
ORDER FOR SETTLEMENT AND  
ENTRY OF JUDGMENT**

Judge: Vaughn R. Walker

Complaint Filed: January 13, 2010

Notice Sent: January 20, 2010

1 WHEREAS, Claimant Jia Yue filed a verified claim for forfeiture in rem on February 24,  
2 2010 (Docket No. 8); and

3 WHEREAS, by Order dated March 5, 2010 (Docket No. 11), this Court ruled that the  
4 present forfeiture case is related to the criminal case of *United States v. Jia Yue*, No. 09-CR-917-  
5 VRW (“the criminal case”), in which Claimant is the Defendant; and

6 WHEREAS, Claimant and the Government have entered into a plea agreement in the  
7 criminal case (“the plea agreement”); and

8 WHEREAS, under the plea agreement, Claimant agreed, in part, to enter a plea of guilty  
9 in the criminal case and to forfeit the property at issue in the present forfeiture case; and

10 WHEREAS, on April 28, 2010, Claimant entered a plea of guilty in the criminal case;  
11 and

12 WHEREAS, under the plea agreement, the Government agreed, in part, not to seek any  
13 further fines, restitution, or forfeiture as a result of the investigation that led to the indictment in  
14 the criminal case and to the forfeiture in the present case,

15 THEREFORE, it is stipulated by and between the Claimant and the Government that:

16 1. The defendant \$10,000 in United States currency seized from Claimant on  
17 September 14, 2009 at San Francisco International Airport and made the subject of the present  
18 forfeiture case shall be forfeited and condemned to the Government pursuant to Title 31, United  
19 States Code, Section 5317(c)(2);

20 2. Claimant shall not be entitled to costs, there being reasonable cause shown for the  
21 seizure of the defendant \$10,000;

22 3. The Government shall not be entitled to costs;

23 4. Claimant shall hold harmless the United States of America, the Department of  
24 Homeland Security, Immigration and Customs Enforcement, and all agents, officers and  
25 employees thereof, including any and all state and local law enforcement officers, for any and all  
26 acts directly or indirectly related to the seizure, detention and forfeiture of the defendant  
27 \$10,000.  
28

5. Each party shall bear its own attorney's fees; and

6. Final judgment incorporating the terms of this stipulation may be entered by the Court.

SO STIPULATED.

Dated: April 28, 2010

By: /s/ Stephanie M. Hinds  
STEPHANIE M. HINDS  
Assistant United States Attorney

Dated: April 28, 2010

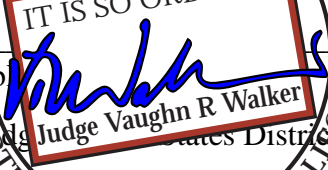

KEKER & VAN NEST LLP

By: /s/ Matan Shacham  
ELLIOT R. PETERS  
BROOK DOOLEY  
GALIA A. PHILLIPS  
MATAN SHACHAM  
Attorneys for Claimant  
JIA YUE

**ORDER**

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: May 7, 2010

Honorable   
Chief Judge Vaughn R. Walker  
United States District Court  


**ATTESTATION OF CONCURRENCE IN FILING**

I hereby attest that Stephanie M. Hinds has concurred in the filing of this document.

/s/ Matan Shacham

MATAN SHACHAM